

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**AKEN GONQUEH, on behalf of himself and all  
others similarly situated,**

**Plaintiff,**

**-against-**

**LEROS POINT TO POINT, INC., LEROS  
MANAGEMENT, INC., JOHN NYIKOS, JEFFREY  
NYIKOS, and CHRISTOPHER NYIKOS,**

**Defendants.**

**No. 14 Civ. 5883 (GHW) (GWG)**

**NOTICE OF PLAINTIFF'S MOTION  
FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

For the reasons set forth in the Memorandum of Law in Support of Plaintiff's Motion for Final Approval of Class Action Settlement ("Motion for Final Approval") and in the Declaration of Brian S. Schaffer in Support of Plaintiff's Motion for Final Approval (the "Schaffer Declaration"), Plaintiff respectfully requests that the Court enter an Order:

(1) granting final approval of the Settlement Agreement and Release ("Settlement Agreement"), attached as Exhibit A to the Schaffer Declaration;

(2) certifying the following settlement class under Federal Rule of Civil Procedure 23(a) and (b)(3) for purposes of effectuating the settlement:

All persons who work or have worked at Leros Point to Point, Inc. and/or Leros Management, Inc. ("Leros") as full time, black car, W2 chauffeurs in New York between July 30, 2008 and June 1, 2015.

(3) issuing final approval of the FLSA settlement;

(4) approving service awards to Aken Gonqueh, Randal Pastor, and Hans Wolff as outlined in the Settlement Agreement;

(5) awarding Class Counsel's attorneys' fees and costs, as outlined in the Settlement

Agreement;

- (6) approving Plaintiff's proposed final settlement procedure; and
- (7) granting such other, further, or different relief as the Court deems just and proper.

Dated: New York, New York  
February 2, 2016

Respectfully submitted,

/s/ Brian S. Schaffer

Brian S. Schaffer

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the Class*